

FILED

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

JUL 09 2024

U.S. DISTRICT COURT WVND
CLARKSBURG, WV 26301

UNITED STATES OF AMERICA,

v.

**TODD M. HOUSTON,
CHRISTOPHER S. DAMSON, and
KAYLA N. TAYLOR,**

Defendants.

Criminal No. 1:24-CR- 39

Violations: 18 U.S.C. § 2
18 U.S.C. § 922(a)(6)
18 U.S.C. § 922(d)(1)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 922(g)(8)
18 U.S.C. § 924(a)(2)
18 U.S.C. § 924(a)(8)
18 U.S.C. § 932(b)(1)
18 U.S.C. § 932(c)(1)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Straw Purchase Firearms)

On or about September 6, 2022, in Monongalia County, in the Northern District of West Virginia, the defendants **TODD M. HOUSTON** and **KAYLA N. TAYLOR** did knowingly and willfully conspire, confederate and agree and have a tacit understanding with each other and with other persons to violate Title 18, United States Code, Section 932(b)(1). It was a purpose and object of the conspiracy for **KAYLA N. TAYLOR** to purchase a firearm in or otherwise affecting interstate or foreign commerce, for, on behalf of, or at the request or demand of **TODD M. HOUSTON**, knowing or having reasonable cause to believe that **TODD M. HOUSTON** had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 932(b)(1) and 932(c)(1).

COUNT TWO

(False Statement in Connection with the Acquisition of a Firearm)

On or about September 6, 2022, in Monongalia County, in the Northern District of West Virginia, defendant **KAYLA N. TAYLOR**, aided and abetted by defendant **TODD M. HOUSTON**, in connection with the attempted acquisition of a firearm, to wit: a Taurus International MFG., INC., semi-automatic pistol, model G3, 9mm caliber, serial number ADH584711, from a licensed dealer of firearms, did knowingly make a false written statement that was intended and likely to deceive such dealer with respect to a fact material to the lawfulness of the sale of such firearm, that is, **KAYLA N. TAYLOR** checked the box “yes” in response to the question “Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheets (ATF Form 5300.9A)?” on question 21a of the Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record; and there below did sign her name certifying that her answers on the form were true, knowing that her said answer to question 21a was false, in violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNT THREE

(Unlawful Sale or Transfer of a Firearm)

On or about September 6, 2022, in Monongalia County, within the Northern District of West Virginia, defendant **KAYLA N. TAYLOR**, knowingly sold and otherwise disposed of a firearm, to wit: a Taurus International MFG., INC., semi-automatic pistol, model G3, 9mm caliber, serial number ADH584711, to a person, knowing and having reasonable cause to believe that the person had been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(8).

COUNT FOUR

(Unlawful Possession of a Firearm)

On or about September 6, 2022, in Monongalia County, within the Northern District of West Virginia, the defendant **TODD M. HOUSTON**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, Burglary, in the Circuit Court of Monongalia County, West Virginia, in Case No. 08-F-116, on July 15, 2008; and Robbery in the First Degree, in the Circuit Court of Monongalia County, West Virginia, in Case No. 16-F-282, on October 26, 2017; did knowingly possess in and affecting interstate or foreign commerce a firearm, to wit: a Taurus International MFG., INC., semi-automatic pistol, model G3, 9mm caliber, serial number ADH584711, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT FIVE

(Unlawful Possession of Ammunition)

On or about December 31, 2022, in Monongalia County, within the Northern District of West Virginia, defendant **CHRISTOPHER S. DAMSON**, knowing that he was subject to a court order issued by the Circuit Court of the Twentieth Judicial Circuit, in and for Lee County, Florida, on August 25, 2021, Case Number 21-031243DR U, and issued after a hearing of which he received actual notice, and at which he had an opportunity to participate, restraining him from committing, and causing any other person to commit, any acts of domestic violence against an intimate partner, that by its terms explicitly prohibited the use, attempted use, and threatened use of physical force against such intimate partner, that would reasonably be expected to cause bodily injury, did knowingly possess ammunition, including: 600 rounds of Winchester USA “Valor” 9mm caliber cartridges (200 rounds in one ammunition box, 116 rounds in a second box, 156 rounds in a third box, and the remaining 128 rounds loose in a yellow DeWalt bag); 200 rounds of Federal brand .223 Remington “American Eagle” ammunition, in two 100-round boxes; a “Range Pack” of 200 rounds of Winchester .45 Auto caliber ammunition; 200 rounds of Winchester .40 S&W caliber ammunition, in two 100-round “Value Packs;” 200 rounds of FN 5.7x28mm caliber ammunition, stored in four 50-round boxes; 49 additional rounds of FN 5.7x28mm ammunition, in a 50-round box (one round apparently missing); 420 rounds of Olin-Winchester M193 5.56x45mm caliber ammunition, stored in a metal manufacturer’s ammunition box; 25 rounds of Hornady Critical Defense 9mm Luger caliber ammunition, in the box; 80 rounds (stored in four 20-round boxes) of Sierra Tipped GameKing 6mm Creedmoor caliber ammunition; and 40 rounds (stored in two 20-round boxes) of Remington 220 Swift caliber ammunition, in and affecting commerce, in that said ammunition had previously been transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(8) and 924(a)(8).

COUNT SIX

(Unlawful Possession of Ammunition)

On or about December 31, 2022, in Monongalia County, within the Northern District of West Virginia, the defendant **TODD M. HOUSTON**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, Burglary, in the Circuit Court of Monongalia County, West Virginia, in Case No. 08-F-116, on July 15, 2008; and Robbery in the First Degree, in the Circuit Court of Monongalia County, West Virginia, in Case No. 16-F-282, on October 26, 2017; did knowingly possess ammunition, including: 600 rounds of Winchester USA "Valor" 9mm caliber cartridges (200 rounds in one ammunition box, 116 rounds in a second box, 156 rounds in a third box, and the remaining 128 rounds loose in a yellow DeWalt bag); 200 rounds of Federal brand .223 Remington "American Eagle" ammunition, in two 100-round boxes; a "Range Pack" of 200 rounds of Winchester .45 Auto caliber ammunition; 200 rounds of Winchester .40 S&W caliber ammunition, in two 100-round "Value Packs;" 200 rounds of FN 5.7x28mm caliber ammunition, stored in four 50-round boxes; 49 additional rounds of FN 5.7x28mm ammunition, in a 50-round box (one round apparently missing); 420 rounds of Olin-Winchester M193 5.56x45mm caliber ammunition, stored in a metal manufacturer's ammunition box; 25 rounds of Hornady Critical Defense 9mm Luger caliber ammunition, in the box; 80 rounds (stored in four 20-round boxes) of Sierra Tipped GameKing 6mm Creedmoor caliber ammunition; and 40 rounds (stored in two 20-round boxes) of Remington 220 Swift caliber ammunition, in and affecting commerce, in that said ammunition had previously been transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

A true bill,

/s/
Foreperson

/s/
WILLIAM IHLENFELD
United States Attorney

Brandon S. Flower
Assistant United States Attorney

William Rhee
Assistant United States Attorney